

# Morgan Lewis

**Joseph A. Nuccio**

+1.609.919.6659

Joseph.nuccio@morganlewis.com

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**VIA ELECTRONIC MAIL (NJDNEF\_WOLFSON@NJD.USCOURTS.GOV)**

The Honorable Freda L. Wolfson  
United States District Court  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Room 2020  
Trenton, New Jersey 08608

Re: Diane Vaccaro v. Amazon.com.dedc, LLC, Case No. 3:18-cv-11852-FLW-TJB

Dear Judge Wolfson:

We represent Defendant in this matter and write on behalf of all parties (with Plaintiffs' counsel's consent) to request an extended briefing schedule as to both Defendant's Motion for Summary Judgment (Dkt. No. 67) and Plaintiff Chiu's Motion for Class Certification (Dkt. No. 69). The parties have conferred and, in order to afford both sides sufficient time to prepare opposition and reply papers (particularly given the upcoming holiday periods), respectfully and jointly propose the following schedule as to both motions:

- Deadline for opposition papers reset to December 20, 2021;
- Deadline for reply papers reset to January 11, 2022; and
- Both motions' motion days be adjourned to January 18, 2022.

This is the parties' first request for adjournment as to either of these motions. If the request is acceptable to Your Honor, a So Ordered line is set forth below. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Joseph A. Nuccio

Joseph A. Nuccio

cc: All counsel of record (via electronic mail)

**SO ORDERED this 15th day of November, 2021.**

/s/ Freda L. Wolfson

**Hon. Freda L. Wolfson  
Chief Judge**

**Morgan, Lewis & Bockius LLP**

502 Carnegie Center  
Princeton, NJ 08540-6241  
United States

**T** +1.609.919.6600  
**F** +1.609.919.6701

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